



Aerospace
Industries
Association

DEPT. OF TRANSPORTATION

00 MAR -6 PM 1:39

FAA-99-6717-43

March 6, 2000

Department of Transportation Dockets
Docket no. FAA-99-6717
400 Seventh Street, SW; Room Plaza 401
Washington , DC 20590

Subject: Docket number FAA-99-6717: 207 Minute Range
Operations with Two-Engine Aircraft (ETOPS)

Gentlemen:

Pursuant to the notice in the Federal Register re: Docket FAA-99-6717, the AIA appreciates the opportunity to comment in support of the FAA decision to permit B-777 airplane ETOPS authorization on North Pacific routings. This authorization will provide additional flexibility in the dispatch of ETOPS flights and be of operational and safety benefit to air carriers.

We concur with the FAA's statement that the B-777 is the only airplane that was designed from the start for ETOPS operation on its first day of service. This required Boeing to address all possible failure modes of past airplanes and engines and demonstrate that the B-777 was designed to preclude those failures. This extensive safety analysis has produced an airplane that exceeds the dispatch reliability of any previous airplane.

We concur with the FAA belief that the operational history of the airplane has proven the validity of this approach and the uniqueness of the B-777 for consideration of 207-minute ETOPS operations. Should other airplanes be presented for approval to operate to 207 minutes, the FAA would assess their design and operational experience in the same way as it has for the B-777.

We fully support the FAA decision.


Joseph Dauksys
Director Engineering & Certification